



California Regional Water Quality Control Board

San Diego Region

Winston H. Hickox
Secretary for
Environmental
Protection

Internet Address: <http://www.swrcb.ca.gov/~rwqcb9/>
9771 Clairemont Mesa Boulevard, Suite A, San Diego, California 92124-1324
Phone (858) 467-2952 • FAX (858) 571-6972



Gray Davis
Governor

N00247.000711
NTC SAN DIEGO
SSIC NO. 5090.3

July 9, 1999

Mr. Keith Forman
BRAC Environmental Coordinator
BRAC Program Office, Code 05BS.KF
1420 Kettner Boulevard, Suite 501
San Diego, California 92101-2404

Mr. Rick Adcock
San Diego Unified Port District
3165 Pacific Highway
San Diego, California 92112

Dear Messrs. Forman and Adcock:

NAVAL TRAINING CENTER (NTC) INACTIVE LANDFILL - TRANSFER OF WASTE DISCHARGE REQUIREMENTS (WDR) RESPONSIBILITY AND REDEVELOPMENT, FORMER NAVAL TRAINING CENTER, SAN DIEGO

By letter dated October 26, 1998 (copy enclosed), Regional Board staff commented on the San Diego Unified Port District's (Port) consideration of three alternatives for development of the former NTC landfill (also referred to as Site 1). The letter also identified the information required for transferring the Waste Discharge Requirements from the Department of Navy (DON) to the Port, and the information required for the proposed change in land use. The DON is proceeding with revision of the Engineering Evaluation/ Cost Analysis (EE/CA), which identifies removal action alternatives to reduce the potential for human and ecological exposure to landfill wastes. We understand the DON and Port will be selecting Alternative 2 as the preferred option for Closure of NTC landfill which includes an asphalt concrete cap on the southern unit with a soil cover on the northern unit. The purpose to this letter is to draw emphasis to Regional Board decision points and to clarify the information needed for the Regional Board to modify and transfer WDR in a timely and efficient manner.

Transfer and Site Development that Require Regulatory Action

As you know, NTC landfill is regulated by Order No. 97-11, *General Waste Discharge Requirements for Post-Closure Maintenance of Inactive Nonhazardous Waste Landfills Within the San Diego Region*. In order to transfer all or a portion of the landfill site to the Port under Order No. 97-11, the DON must notify the RWQCB in writing of any proposed change of ownership or responsibility for construction, operation, closure, or post-closure maintenance of the landfill. Reporting Requirement E.3 of Order No. 97-11 states the following:

"The discharger shall notify the Executive Officer, in writing, at least 30 days in advance of any proposed transfer of this Order's responsibility and coverage between the current owner and new owner for construction, operation, closure, or post-closure maintenance of

California Environmental Protection Agency

Recycled Paper



a landfill. This agreement shall include an acknowledgment that the existing owner is liable for violations up to the transfer date and that the new owner is liable from the transfer date on. The agreement shall include an acknowledgment that the new owners shall accept responsibility for compliance with this Order which includes the post-closure maintenance of the landfill."

The notice should include a map of the site which delineates the complete waste boundary for the inactive landfill and indicate the portion(s) of the landfill that the Port will be responsible for monitoring and maintaining in accordance with Order No. 97-11. Please also complete *Application for Solid Waste Facility Permit/Waste Discharge Requirements* (copy attached) providing address, contact information, and signed by a responsible agent representing the Port.

The DON must also notify all property owners adjacent to Site 1, which may have waste underlying their property, i.e. Small Arms Range, and Fleet Anti-Submarine Warfare Training Center parcels. This notification should include an estimated boundary, depth, volume and description of waste likely to be found on adjacent property. The RWQCB will evaluate this data and determine whether these adjacent property owners should be named in any subsequent WDR issued for the site.

Please note that Section 21730(b) of Title 27, requires the Regional Board provide a minimum 45 day notice prior to any planned actions of the Regional Board. Assuming the documents you provide are complete, we estimate that that the process for reviewing, processing and preparing revised Waste Discharge Requirements (WDR) could be complete within approximately sixty days. If, for example, it was necessary to transfer Order No. 97-11 at the September 14, 1999 Regional Board meeting, we would need all documentation on or about July 14, 1999. Please consider this time frame for planning purposes to transfer Site 1 from the DON to the Port.

Closure and Post-Closure Land Use

The modifications to the landfill cover identified in Alternative 2, i.e. roadway and parking structure, is considered a significant alteration to land, which requires modification to Order No. 97-11. Information must be submitted in the form of a Report of Waste Discharge (ROWD), that provides sufficient information on waste characteristics, closure, post - closure maintenance, financial assurance, and future responsibility. We anticipate information contained in the revised EE/CA, the Environmental Response Obligation Addendum (EROA), and Finding of Suitability for Early Transfer (FOSET) reports, (expected to be completed September 3, and August 30, 1999, respectively) may be sufficient to satisfy state requirements to serve as ROWD. Once the ROWD is determined complete, we will prepare WDR within 120 days. The WDR will specify proper closure, post-closure maintenance, water quality monitoring, financial assurance, and ongoing responsibility for the site.



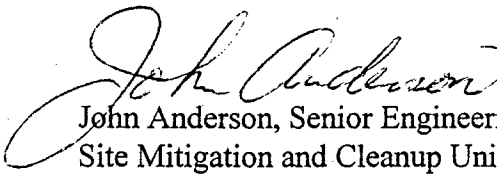
July 9, 1999

California Environmental Quality Act (CEQA)

The transfer, revision, modification, or issuance of new WDR is a discretionary act that requires the Regional Board to ensure completion of CEQA. We believe the Port, in their capacity as project proponent and future landowner, is the appropriate agency to complete CEQA for both the transfer and redevelopment of the NTC landfill. Further, under normal circumstances, when the Port undertakes a similar construction project, we expect that the Port would act as lead agency for CEQA. The Port has the expertise and resources to complete CEQA in a timely manner. CEQA may be completed by finding of exemption, certification of a mitigated negative declaration, EIR, or a supplemental EIR completed by the Navy and the City of San Diego for the transfer of the base to private hands. Other options to complete CEQA is for the DON to prepare environmental documents under NEPA that could be circulated as functional equivalents to CEQA.

I hope this information is useful to you in the planning stages of early transfer from the DON to the Port. Please contact Corey Walsh at (858) 467-2980 or Carol Tamaki (858) 467-2982 if you have any questions regarding this letter.

Sincerely,


John Anderson, Senior Engineering Geologist
Site Mitigation and Cleanup Unit

CW:mja:cat

- Enclosures: 1) Letter dated October 26, 1998
- 2) Application for Solid Waste Facility Permit/Waste Discharge Requirements

cc:

Ms. Content Arnold, Remedial Project Manager, BRAC Operations Office, Code 05BS.CA, 1420 Kettner Blvd. Suite 501, San Diego, CA 92101-2404

Mr. Martin Hausladen, U.S. EPA, Region IX, (H-9-2), Hazardous Waste Management Division, 75 Hawthorne Street, San Francisco, CA 94105-3901

Mr. Glenn Young, Remediation, Closure & technical Services, California Integrated Waste Management Board, 8800 Cal Center Drive, Sacramento, CA 95826

California Environmental Protection Agency

Recycled Paper



July 9, 1999

Paul Manasjan, Solid Waste Local Enforcement Agency, City of San Diego, 1222 First Avenue, MS501, San Diego, CA 92101-4155

John Adams, DoD Program Manager, Division of Clean Water Programs, State Water Resources Control Board



APPLICATION FOR SOLID WASTE FACILITY PERMIT/WASTE DISCHARGE REQUIREMENTS

CIWMB E-1-77 (Rev. 6/96)

ENFORCEMENT AGENCY: _____

COUNTY: _____

TYPE OF APPLICATION: _____

- ☐ 1. NEW SWFP AND/OR WDRS ☐ 4. REVIEW
☐ 2. REVISION OF SWFP AND/OR WDRS ☐ 5. AMENDMENT OF APPLICATION
☐ 3. EXEMPTION AND/OR WAIVER ☐ 6. RFI/ROWD/JTD AMENDMENTS ☐ 7. CHANGE OF OWNER/OPERATOR OR ADDRESS

FOR OFFICIAL USE ONLY

SWIS NUMBER _____

DATE RECEIVED: _____

DATE ACCEPTED: _____

DATE REJECTED: _____

FILING FEE: _____

RECEIPT NUMBER: _____

DATE ACCEPTANCE OF
INCOMPLETE APPLICATION: _____

NOTE: This form has been developed for multiple uses. It is the transmittal sheet for documents required to be submitted to the appropriate agency. See instructions for completing this application.

I. GENERAL

DESCRIPTION

OF

FACILITY

A. NAME OF FACILITY: _____

B. LOCATION OF FACILITY: (Give address or location, also include legal description by section, township, range, base, and meridian if surveyed or projected.) _____

C. TYPE OF OPERATION: (Check applicable boxes.)

☐ DISPOSAL

TYPE: _____

☐ COMPOSTING

TYPE: _____

☐ TRANSFORMATION☐ TRANSFER OR

PROCESSING STATION

TYPE: _____

☐ SEWAGE TREATMENT☐ INDUSTRY (discharge to sewer)☐ INDUSTRY (on-site disposal)☐ OTHER (describe): _____

D. COSWMP/CIWMP REFERENCES: _____

DATE OF DOCUMENT: _____

PAGES: _____

E. TYPE OF WASTES TO BE RECEIVED: (Check applicable boxes.)

☐ AGRICULTURAL☐ ASBESTOS☐ ASH☐ AUTO SHREDDER☐ CONSTRUCTION/DEMOLITION☐ DEAD ANIMALS☐ FRIABLE - ASBESTOS☐ INDUSTRIAL☐ LIQUIDS☐ MIXED MUNICIPAL☐ SLUDGE☐ TIRES☐ WOOD MILL☐ OTHER: (describe) _____

II. FACILITY

INFORMATION

A. PROPOSED CHANGE (Check applicable boxes)

☐ DESIGN (describe) _____☐ OPERATION (describe) _____☐ OTHER (describe) _____

B. FACILITY INFORMATION:

PEAK DAILY LOADING
(TPD):AVERAGE ANNUAL
LOADING (TPY):

SITE CAPACITY(yds):

FACILITY SIZE (acres):

DISPOSAL
AREA:

TOTAL WASTE IN PLACE (yds):

AREA IN WHICH SOIL WILL BE
DISTURBED (acres):

DESIGN AIR SPACE CAPACITY:

EXPECTED CLOSURE DATE: _____

C. PRESENT OR PROPOSED:

DAILY FLOW (in MGD):

MAXIMUM:

AVERAGE:

DESIGN FLOW (in MGD):

III

SOURCE OF WATER SUPPLY (check all appropriate)

A. MUNICIPAL OR UTILITY SERVICE:

NAME OF WATER SURVEYOR _____

B. INDIVIDUAL (wells)

C. SURFACE SUPPLY:

NAME OF STREAM, LAKE, ETC _____

TYPE OF WATER RIGHTS:

☐ RIPARIAN☐ APPROPRIATION

(OVER)

INSTRUCTIONS FOR COMPLETING THE APPLICATION

This application form is for a Solid Waste Facilities Permit and /or waste discharge requirements to receive, store, process, transform, or dispose of solid waste regulated by the California Integrated Waste Management Board (CIWMB) and the California Regional Water Quality Control Boards (RWQCB). This form and the filing fee should be sent to the appropriate agency(s) as indicated below:

FORM USE

APPROPRIATE AGENCY

Application for a Solid Waste Facilities Permit
Report of Waste Discharge / WDRs

CIWMB
X

RWQCB

X

If you have any questions on the completion of this form, please contact the appropriate agency for assistance.

For direct discharge (point source discharge) to surface waters, a different application form is required in place of this Form. Please contact the appropriate RWQCB for a National Discharge Elimination System (NPDES) application form to apply for a permit for this type of discharge.

This application for waste disposal provides initial notice of a waste discharge. In most instances, additional information will be required, and should be submitted on 8 1/2" X 11" paper. Complete this form and return it with two copies of any required report and the filing fee to each appropriate agency(s). The agency(s) will advise you of any addition information that may be required to complete this application and waste disposal report.

The effective date of the application is the date when all required information and the correct fee are received by the agency(s). You will be notified of this effective date by each agency.

AMOUNT OF FILING FEES

CIWMB

The enforcement agencies shall determine the exact fee.

RWQCB

Use flow or units reported in item III (application form) and the appropriate class schedule A, B, B1, B3, or C (attached filing fee schedule).

Check with local or county enforcement agency for specific permit requirements and/or exemptions.

REQUIRED REPORT FOR CIWMB

A "Report of Disposal Site Information" is required to obtain a permit to operate a disposal site.

A "Report of Station Information" is required to obtain a permit to operate a large volume transfer station (greater than 100 cubic yards per operating day).

A "plan of Operation" is required to obtain a permit to operate a small volume transfer station (less than 100 cubic yards per operating day).

A "Report of Composting Site Information" is required to obtain a permit to operate a composting operation.

Where there is a significant change in design, operation, operator, or size of facility, details of the changes must be submitted to amend previous reports.

No instructions will be listed for items that are self-explanatory.

I. GENERAL DESCRIPTION OF FACILITY

- B. Location of Facility: Map or sketch should be to a scale adequate to show location precisely. Use of a portion of a U.S.G.S. Quadrangle map is recommended. Map must show proximity of disposal location to populated areas and must indicate all wells and drainage courses within 1,000 feet of any disposal point.



Peter M. Rooney
Secretary for
Environmental
Protection

California Regional Water Quality Control Board

San Diego Region

Internet Address: <http://www.swrcb.ca.gov/~rwqcb9>
9771 Clairemont Mesa Boulevard, Suite A, San Diego, California 92124-1324
Phone (619) 467-2952 FAX (619) 571-6972



Pete Wilson
Governor

October 26, 1998

Mr. Keith Forman
BRAC Environmental Coordinator
BRAC Program Office, Code 05BS.KF
1420 Kettner Boulevard, Suite 501
San Diego, CA 92101-2404

Dear Mr. Forman:

NTC INACTIVE LANDFILL PRE-CONSTRUCTION STUDY, NAVAL TRAINING CENTER, SAN DIEGO

Regional Water Quality Control Board (RWQCB) staff has completed our review of the subject document, dated June 9, 1998 and received by this office on October 1, 1998. The report was prepared by Ninyo & Moore on behalf of the San Diego Unified Port District (SDUPD) to evaluate the Naval Training Center (NTC) inactive landfill for potential expansion of the adjacent San Diego International Airport facility. The document was submitted by the US Navy to the RWQCB for review pursuant to the Defense State Memorandum of Agreement (DSMOA) as a foundation document to the development of the Engineering Evaluation/Cost Analysis (EE/CA). Our comments were discussed in a meeting on October 15, 1998, between representatives of the Navy, SDUPD, City of San Diego, California Integrated Waste Management Board (IWMB), and representatives of the consulting firms Bechtel National and Ninyo & Moore. Based on our review of the Pre-Construction Study and discussions with the Navy and SDUPD we have the following comments.

Revision of Landfill Boundary and Reclassification of Waste

This study includes sampling results from numerous trenches, soil borings, cone penetrometer tests, and groundwater monitoring wells surrounding the NTC inactive landfill. The data presented identified three relatively distinct waste management units (WMUs): (1) a northern unit consisting of burned refuse, characterized by black ash material and glass fragments; (2) a central unit consisting of municipal solid refuse, characterized by decomposable waste; and (3) a southern unit consisting primarily of construction debris and lesser amounts of landscaping material, characterized as being less soluble and decomposable than the northern and central units.

Based on limited sample data the study recommends the waste in the southern unit be classified as inert waste. The study further proposes, that based upon the inert classification, to redefine the boundaries of the landfill by excluding this unit from regulation by the Regional Board.

California Environmental Protection Agency

Section 20230(a) of Title 27 defines inert waste as a subset of solid waste that does not contain hazardous waste or soluble pollutants at concentrations in excess of applicable water quality objectives and does not contain significant quantities of decomposable waste. Section 20230(c) of Title 27 allow the Regional Board to prescribe individual or general Waste Discharge Requirements (WDRs) for discharges of inert wastes. While it appears the southern unit poses a lower threat to water quality than the other units, the data suggests the buried decomposable landscape waste and construction debris may contain soluble pollutants that are leachable to groundwater. However, the characteristics of the waste in this unit do suggest it has a lower need for long-term maintenance and water quality monitoring. At this time, we do not concur that there is sufficient data to classify the southern unit as inert. Therefore, we recommend the southern unit continue to be considered as part of the landfill.

Evaluation of Proposed Remedial Alternatives

The pre-construction study was completed to guide development of a master plan and design effort for redevelopment of the site. Subsequently, the SDUPD was to identify anticipated future land use in order for the Navy to adopt an appropriate remedial action to be implemented at the site. The SDUPD has identified an immediate need for automobile parking in the southern half of the site and has tentatively identified wildlife habitat, open space, automobile parking and/or construction of structures that could encompass the northern and central units of the landfill.

The pre-construction study also considered three alternatives for development of the NTC landfill. Our comments on each alternative are provided below:

Alternative 1: Construction of Asphalt Concrete Cap Over the Entire Landfill

An asphalt concrete pavement cap is proposed to overlie the entire landfill and be used to expand automobile parking for the facility. Based on our experience with the use of asphalt concrete pavement and other structural improvements overlying other landfills throughout the San Diego Region, the cost for maintaining the landfill cover can be greatly underestimated. Significant disruptions to site development can also occur from differential settlement of site improvements and subsequent required maintenance. In recent years, we have observed subsidence and significant ponding of rain water, primarily in the central and northern units of the NTC inactive landfill. This settlement, and subsequent ponding in both developed (paved) and undeveloped areas has been historically noted as violations of the existing waste discharge requirements (WDRs). If the central unit of highly compressible waste were to be covered with an asphalt concrete cap the anticipated cracking and settlement would likely aggravate drainage and consolidation problems at the site. A pavement cap would require annual inspections and repairs as necessary and could possibly require demolition and reconstructed. Another area of concern is the installation of subsurface utilities (i.e. sewer, water, and electrical services) that maybe proposed for installation into or across areas containing waste. This remedial alternative does

not address the possible need for landfill gas control and monitoring. We do not recommend this alternative for final cover of the landfill.

**Alternative 2: Construction of Asphalt Concrete Cap on the Southern Unit of the Landfill
with Remaining Northern Units Remaining as Undeveloped Open Space**

This alternative proposes paving the southern unit and continue to maintain the central and northern units as undeveloped open space and wildlife habitat. The final soil cap design for the central and northern units would need to be designed to promote positive drainage and to reduce infiltration. Annual maintenance of the cap would continue to be required to eliminate ponding of surface waters. A groundwater monitoring program would also continue to be required. This alternative would be acceptable to the RWQCB staff, and would require less costly maintenance than Alternative 1.

Alternative: 3 - Clean Closure of Central Unit

This alternative proposes excavation of all decomposable waste in the central unit. The study indicates this would be the most expensive alternative in the short term and thus the SDUPD has not identified this as the preferred alternative. During the October 15, 1998 meeting, Glenn Young, of the IWMB indicated the estimates for excavation and tipping fees in the pre-construction study may be higher than actual costs. In addition, the actual cost of long-term maintenance and the potential for corrective action using Alternatives 1 or 2 may be higher than those estimated in this study. Considering all of these factors together, clean closure may represent a more cost effective long-term alternative, particularly when anticipated future land use of the central and northern portion of the landfill include construction of parking and other structural improvements. We also believe this alternative removes potential impacts of buried waste on groundwater and provides a higher level of environmental protection.

RWQCB Staff Recommendations

The RWQCB staff does not believe it is appropriate to construct pavement or other structures on landfills, such as the central unit, which is underlain by refuse and is susceptible to differential settlement. Alternative 1 does not appear to be reasonable based on identified future land uses. However, if the SDUPD is unable to define the final land use for the northern and central units, we believe that Alternative 2 could be implemented. Lastly, if the final land use of the northern and central units will include any type of structural improvement, then the RWQCB staff would recommend Alternative 3 be implemented to eliminate the potential for differential settlement and any potential adverse environmental impacts.

Transfer And Site Development That Require Regulatory Action

NTC landfill is currently regulated under Regional Board Order No. 97-11, General Waste Discharge Requirements for Inactive Landfills. Under Order No. 97-11 site maintenance and water quality monitoring is required. The transfer of the site from the US Navy to the San Diego Unified Port District could be accomplished under Order 97-11 by a notification to this office with information specified in 27 CCR Section 21710 (c) (1), which states:

"Change of Ownership: The discharger shall notify the RWQCB in writing of any proposed change of ownership or responsibility for construction, operation, closure, or post-closure maintenance of a unit. This notification shall be given prior to the effective date of the change and shall include a statement by the new discharger that construction, operation, closure and post-closure maintenance will be in compliance with any existing waste discharge requirements and any revision thereof. The RWQCB shall amend the existing waste discharge requirements to name the new discharger."

With regard to any of the proposed modifications to land, each of the proposed Alternatives 1, 2, and 3, will result in a change in land use of the inactive landfill. These proposed modifications require amending WDRs. Based on proposed modifications in land use, identification of three distinct WMUs and modification to the final cover of the inactive landfill, we anticipate drafting individual WDRs for this facility.

In order for the Regional Board to modify the WDRs, information must be submitted in the form of a Report of Waste Discharge (ROWD), that provides sufficient information on waste characteristics, closure, post-closure maintenance, financial assurance, and written notification of proposed change of ownership of the NTC inactive landfill property from the Navy to the San Diego Unified Port District. We anticipate information contained in the subject study, the revised EE/CA, the EROS, and other technical information, (expected to be completed in November 1998 and February 1999, respectively) will contain sufficient detail to serve as the ROWD. Once the ROWD is determined complete, RWQCB staff can begin preparation of tentative revised WDR within 120 days. WDRs will specify proper closure, post-closure maintenance, financial assurance, and will add the San Diego Unified Port District as a responsible party for compliance with WDRs.

California Environmental Quality Act (CEQA)

Issuance of new or amended WDR is a discretionary act that requires the Regional Board to comply with CEQA. Furthermore, we expect that CEQA would also be necessary for a either alternative proposed in the pre-construction study. At this time, we believe the San Diego Unified Port District, in their capacity as primary agency overseeing the closure of the inactive landfill, is the appropriate choice as lead agency to complete CEQA for this project. CEQA may be a completed by an exemption, Negative Declaration, mitigated Negative Declaration.

Mr. Keith Forman
Pre-Construction Study

-5-

October 26, 1998

Environmental Impact Report (EIR), or perhaps as a supplemental to the existing EIR for the transfer of the NTC base. We believe the San Diego Unified Port District has the expertise and resources to complete CEQA in a timely manner. The preparation of CEQA can be concurrent with other investigations ongoing at the site. The CEQA process may be time consuming, we therefore suggest that the lead agency be identified and work begin as soon as possible.

Please contact Corey Walsh at (619) 467-2980 or Carol Tamaki (619) 467-2982 if you have any questions regarding this letter.

Sincerely,

Corey M. Walsh

COREY M. WALSH, Associate Engineering Geologist
Site Mitigation and Cleanup Unit
dod-ntc/site1\sdupdpes.doc

FILE: 30-0092.N02
06-0035.01

CMW:mja:cmw:cat

cc:

Ms. Content Arnold, Remedial Project Manager, BRAC Operations Office, Code 05BS.CA,
1420 Kettner Blvd. Suite 501. San Diego, CA 92101-2404

Mr. Martin Hausladen, U.S. EPA, Region IX, (H-9-2), Hazardous Waste Management Division,
75 Hawthorne Street, San Francisco, CA 94105-3901

Mr. Glenn Young, Remediation, Closure and Technical Services, California Integrated Waste
Management Board, 8800 Cal Center Drive, Sacramento. CA 95826-3268

Mr. Martin Kenney, U.S. Fish and Wildlife Service, 2730 Loken Ave. West, Carlsbad. CA
92008

Ms. Betsy Weisman, NTC Reuse Project Director, City of San Diego, 202 C Street MS5A, San
Diego, CA 92101

California Environmental Protection Agency